

2 to CT
propo4
8/14/01
JLIN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Barbara A. Wilhelm	:	Civil Law Action
	:	
Plaintiff	:	
	:	
v.	:	Case No.: 1:01-CV-1057
	:	(The Honorable Sylvia H. Rambo)
	:	
	:	
Pennsylvania State Police,	:	
Commonwealth of Pennsylvania,	:	
Colonel Paul J. Evanko,	:	
Lieutenant Colonel Thomas K. Coury,	:	
Captain Michael D. Simmers	:	
Defendants	:	

FILED
HARRISBURG
AUG 13 2001
MARY E. D'ANDREA, CLERK
PER
DEPUTY CLERK

MOTION FOR JUDGMENT ON THE PLEADINGS

AND NOW, comes the Plaintiff, Barbara A. Wilhelm, by and through her attorney, to file her Motion For Judgment On The Pleadings in the above-captioned matter, and avers as follows:

1. The instant complaint was filed with this Court on June 14, 2001.
2. The complaint sets forth averments describing numerous acts of sexual discrimination committed by the defendants constituting *prima facie* evidence of violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, 42 U.S.C. §§ 1983 and 1988, and the Pennsylvania Human Relations Act, 43 Pa. C. S § 955.
3. Copies of the complaint and the accompanying summons were properly served on each of the defendants by officers of the Dauphin County Sheriff's Office on

July 20, 2001.

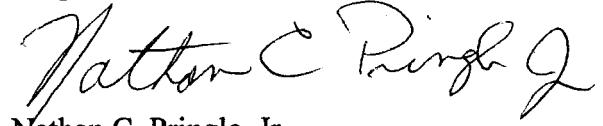
4. Each summons included a notice to file an answer to the complaint within twenty (20) days.

5. As of August 10, 2001, twenty-one days after receiving the summons and complaint, none of the defendants filed an answer to any of the averments set forth in the complaint.

6. As of August 10, 2001, the Defendants have not denied any of the averments set forth in the complaint, and as such have admitted each of them.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court enter a judgment in favor of the Plaintiff for all damages, costs and attorney's fees sought by the Plaintiff.

Respectfully Submitted,



Nathan C. Pringle, Jr.
Atty. ID # 30142
3601 N. Progress Avenue
Suite 200
Harrisburg, Pennsylvania 17110
(717) 909-8520
Attorney for Plaintiff

Dated: August 13, 2001

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Barbara A. Wilhelm	:	Civil Law Action
	:	
Plaintiff	:	
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v.	:	Case No.: 1:01-CV-1057
	:	(The Honorable Sylvia H. Rambo)
	:	
	:	
Pennsylvania State Police,	:	
Commonwealth of Pennsylvania,	:	
Colonel Paul J. Evanko,	:	
Lieutenant Colonel Thomas K. Coury,	:	
Captain Michael D. Simmers	:	

Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2001, I served a true and correct copy of the foregoing Motion For Judgment On the Pleadings upon the persons and in the manner indicated below.

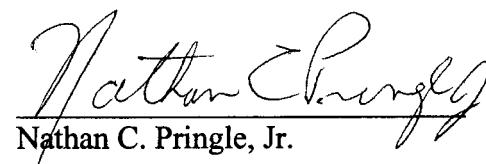
Served by First Class Mail, Certified and addressed as follows:

Colonel Paul J. Evanko,
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, Pennsylvania 17110

Lieutenant Colonel Thomas K. Coury
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, Pennsylvania 17110

Captain Michael D. Simmers
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, Pennsylvania 17110

Barbara L. Christie
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, Pennsylvania 17110


Nathan C. Pringle, Jr.